

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

18 Cr. 567 (VSB)

CHRISTOPHER COLLINS,
CAMERON COLLINS, and
STEPHEN ZARSKY,

Defendants.

DECLARATION OF REBECCA M. RICIGLIANO

1. I am a partner at Crowell & Moring LLP, counsel for defendant Cameron Collins in the above-captioned matter.
2. I submit this declaration in support of the motion by Christopher Collins, Cameron Collins, and Stephen Zarsky (the “Defendants”) requesting that this Court order the government to provide a bill of particulars. I further submit this declaration to provide the certification required pursuant to Local Criminal Rule 16.1.
3. On December 10, 2018, the Defendants submitted a letter to the government requesting a bill of particulars specifying a number of allegations in the Indictment.
4. On December 28, 2018, the government responded by letter, in which the government voluntarily provided limited responses to certain of Defendants’ requests for particulars but expressed its view that a bill of particulars is not required in this case. In its letter, the government declined to respond to the remainder of the Defendants’ requests.
5. Defendants’ counsel conferred with the government in a good faith effort to resolve the issues raised by the Defendants’ motion for a bill of particulars but were unable to reach an agreement.

Dated: February 7, 2019

Respectfully submitted,



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